

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE APPLICATION OF BENJAMIN STEINMETZ
FOR AN ORDER TO TAKE DISCOVERY FROM
VALE S.A., VALE AMERICAS INC., RIO TINTO
PLC, AND RIO TINTO LIMITED PURSUANT TO
28 U.S.C. § 1782

Case No. 1:20-MC-00212 (AJN)

**DECLARATION OF VICTORIA R. MORRIS IN SUPPORT OF
REPLY MEMORANDUM OF LAW TO VALE S.A. AND VALE AMERICAS INC.’S
OPPOSITION TO BENJAMIN STEINMETZ’S APPLICATION FOR
AN ORDER TO TAKE DISCOVERY PURSUANT TO 28 U.S.C. § 1782**

Victoria R. Morris declares the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am an attorney duly admitted to practice law in the State of Florida and the District of Columbia. I am a member of the Bar of the State of Florida and of the District of Columbia, and have been admitted to practice *pro hac vice* in this Court. I have been practicing law for four years. I am currently an associate at Kobre & Kim LLP (“Kobre & Kim”), located at 201 South Biscayne Boulevard, Suite 1900, Miami, Florida 33131. Kobre & Kim is counsel for Mr. Benjamin Steinmetz (the “Applicant” or “Steinmetz”) in this action.

2. I submit this Declaration in support of Applicant’s Reply Memorandum of Law to Vale S.A. and Vale Americas Inc.’s Opposition to Benjamin Steinmetz’s Application for an Order to Take Discovery Pursuant to 28 U.S.C. § 1782.

3. Except as otherwise indicated, all statements in this Declaration are based upon my personal knowledge and experience, or upon my review of publicly available materials or materials provided to Kobre & Kim in connection with its representation of the Applicant.

4. Attached hereto as Exhibit 1 is a true and correct copy of the media article “Vale Says Billionaire’s ‘Publicity Stunt’ Distraction From Fraud” by Morgan Conley, published by *Law360* on June 26, 2020, and available at <https://www.law360.com/articles/1287049>.

5. Attached hereto as Exhibit 2 is a true and correct copy of the media article “Billionaire Claims Vale Knew Guinea Mining Deal Was Corrupt” by Caroline Simson, published by *Law360* on May 26, 2020, and available at <https://www.law360.com/articles/1276561>.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 27, 2020
Miami, Florida

Respectfully submitted,

/s/ Victoria R. Morris

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